

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
W. R. GRACE & CO., et al., <sup>1</sup>	)	Case No. 01-01139 (KJC)
	)	(Jointly Administered)
Reorganized Debtors.	)	
	)	Re: Docket Nos.: 32600, 32633 and 32619

**CERTIFICATION OF COUNSEL REGARDING [PROPOSED] SCHEDULING ORDER  
RE THIRTY-EIGHTH OMNIBUS OBJECTION TO CLAIMS FILED BY SGH  
ENTERPRISES, INC. (SUBSTANTIVE AND NON-SUBSTANTIVE OBJECTION)**

1. On August 18, 2015, W. R. Grace & Co. ("Grace") filed the Thirty-Eighth Omnibus Objection to Claims Filed by SGH Enterprises, Inc. (Substantive and Non-Substantive Objection) (the "Objection") [Docket No. 32600].

2. On August 26, 2015, the parties entered in the Stipulation: (I) Extending the Response Deadline SGH Enterprises, Inc. Regarding Reorganized Debtors' Thirty-Eighth Omnibus Objection Claim, and (II) Abating Interest, and (III) Continuing the hearing with Respect Thereto (the "Stipulation") [Docket No. 32619].

3. On October 19, 2015, SGS Enterprises, Inc. ("SGH") filed the SGH Enterprises, Inc.'s Response to Thirty-Eighth Omnibus Objection to Claims Filed by SGH Enterprises, Inc. (Substantive and Non-Substantive Objection) (the "SGH Response") [Docket No. 32633].

4. The Parties have conferred and agreed to the scheduling order attached hereto as Exhibit A (the "Proposed Scheduling Order").

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<sup>1</sup> The Reorganized Debtors are W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.) and W. R. Grace & Co.-Conn.

It is hereby respectfully requested that the Proposed Scheduling Order be entered  
at the Court's earliest convenience.

Dated: March 14, 2065

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